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Distributors LLC, Robert S. Dow, and the individual defendants identified in the
Complaints filed as "The Partners"

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In Re LORD ABBETT MUTUAL FUNDS
FEE LITIGATION

MASTER FILE: 04-cv-559 (WJM)

**NOTICE OF MOTION TO DISMISS
THE CONSOLIDATED AMENDED
CLASS ACTION COMPLAINT**

THIS DOCUMENT RELATES TO: ALL ACTIONS

PLEASE TAKE NOTICE that on February 28, 2005, or as soon thereafter as
counsel may be heard, Kirkpatrick & Lockhart LLP, attorneys for Defendants, Lord Abbett &
Co., LLC, Lord Abbett Distributors LLC (collectively "Lord Abbett"), Robert S. Dow and the
individual defendants identified in the Consolidated Amended Class Action Complaint (the
"Complaint") as "The Partners" (the "Partner Defendants"), will move pursuant to Fed. R. Civ.

P. 8(a), 9(b), 12(b)(6) and 23.1 and L. Civ. R. 7.1, before the Honorable William J. Martini, United States District Judge, at the Martin Luther King, Jr. Federal Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order dismissing the Complaint with prejudice, and for such other relief as the Court deems just and proper;

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lord Abbett, Robert S. Dow and the Partner Defendants will rely upon the accompanying: (i) Certification of Christopher A. Barbarisi, and the exhibits attached thereto; (ii) the Memorandum of Law in Support of this motion; (iii) the Certificate of Service; and (iv) the proposed Order;

PLEASE TAKE FURTHER NOTICE that plaintiffs' opposition to this motion, if any, shall be served and filed on or before January 14, 2005, and Defendants' reply, if any, shall be served and filed on or before February 14, 2005.



CHRISTOPHER A. BARBARISI

Dated: November 16, 2004